

May 24, 2018

Nicole M. Cunningham
Planning, Policy & Quality Unit
Division of Medicaid & Medical Assistance
1901 N. DuPont Hwy.
P.O. Box 906
New Castle, DE 19720-0906

RE: DMMA Proposed DSHP Section 1115 Demonstration Waiver Amendment and Extension Application Request Regulation [21 DE Reg. 917 (May 1, 2018)]

Dear Ms. Cunningham:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Medicaid and Medicare Assistance (DMMA) proposal to immediately amend Section 1115 of the Delaware Diamond State Health Plan (DSHP) Demonstration Waiver to address Medicaid coverage of substance use disorder (SUD) treatment services when provided in a setting that qualifies as an institution for mental diseases (IMD) and the DMMA request for a five year extension of the DSHP. Council **endorses** the proposed amendment which will allow IMD settings to be included as Medicaid-covered settings for SUD treatment and would like to share the following observations on the extension request.

The DMMA draft is noteworthy in that it references an interim evaluation that shows general success, but that additional efforts may be needed with respect to the PROMISE program and coordination of care for dual eligible individuals. These conclusions were based on 2016 and 2107 assessments. Council would like to request more information on how DMMA will address deficiencies in these areas.

Council would also like to request that DMMA increase thresholds for some services. Limits on home modifications under DSHP+ is one area in need of an increased threshold. Currently, this benefit is limited to \$6000 per project, \$10,000 per year, with a \$20,000 lifetime limit. Additionally, stair lifts and elevators are specifically excluded. These limits should be increased to reflect the actual cost of common modifications as well as increasing costs over time. Furthermore, some mechanism should be added to cover stair lifts (which do not improve the

value of a home or make it more usable to others) in certain circumstances. Particularly in older, urban homes, stair lifts may be the only way to create accessibility and a viable community placement for an individual.

Thank you for your consideration of our endorsement and observations. Please contact me or Wendy Strauss at the GACEC office if you have any questions.

Sincerely,

Terri A. Hancharick
Vice Chairperson

TAH:kpc